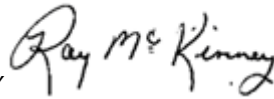


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PROCEDURE INSTRUCTION LETTER NO. I05-V-02

FROM: RAY McKINNEY
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Coal Mine Safety and Health



SUBJECT: Fall Protection during Concrete Storage Silo Construction

Scope

This Procedure Instruction Letter (PIL) applies to Coal Mine Safety and Health (CMS&H) enforcement personnel.

Purpose

This PIL provides information concerning applicable fall protection standards during construction of concrete storage silos.

Procedure Instruction

Backguards required by 30 CFR 77.206(c) may provide adequate fall protection if the backguard does not interfere with safe work methods of construction. Where the use of backguards may hinder safe work methods, (such as the need to continually adjust the scaffolding surrounding the ladders) inspectors should determine whether safety harnesses and lines are in use which provide fall protection without the additional use of backguards.

Section 77.1710(g) requires "safety belts and lines where there is danger of falling." Safety belts and lines shall be provided where there is a danger of falling during construction of concrete storage silos. If backguards on ladders hinder safe work methods in constructing the concrete storage silo, inspectors should determine if safety belts and lines provide adequate fall protection without the use of backguards and apply 30 CFR 77.1710(g) rather than 30 CFR 77.206(c) at such construction sites. The use of full body safety harnesses and lines will allow for greater freedom of movement.

Although backguards may not be capable of being safely used, ladders shall be properly designed, constructed, and securely anchored in accordance with 30 CFR 77.206(a)-(b) and (d)-(f). In addition, at construction sites for concrete storage silos, adequate protection from falling equipment or material shall be provided for those working or passing below overhead work areas in accordance with 30 CFR 77.203. Also, workers shall stay clear of hoisted loads in accordance with 30 CFR 77.210.

Mine Safety and Health Administration (MSHA) inspectors should routinely interview and observe workers constructing concrete storage silos to assure that safety harnesses and lines are properly installed and used. Hazard training specifically addressing the use and maintenance of safety harnesses and lines should be provided to those engaged in the construction of concrete storage silos in accordance with 30 CFR 48.31(a)(5).

Background

Questions have arisen concerning the applicable fall protection standard during construction of concrete storage silos. This PIL clarifies that if backguards on ladders interfere with safe construction or work methods, 30 CFR 77.1710(g) rather than 30 CFR 77.206(c) should be enforced in determining whether there is adequate fall protection at the concrete storage silo construction site.

Authority

30 CFR 48.31(a)(5)

30 CFR 77.203

30 CFR 77.206

30 CFR 77.210

30 CFR 77.1710(g)

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Internet Availability

This letter, as well as the Program Policy Manual, may be viewed on the Internet by accessing MSHA's web site (www.msha.gov), click on "Compliance Info" and then click "Program Instruction Letters."

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